

# **EXHIBIT 1**

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re Wells Fargo Mortgage ) Case No.  
Discrimination Litigation. ) 3:22-cv-00990-JD

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VIRTUAL VIDEOCONFERENCE VIDEO-RECORDED DEPOSITION OF  
JOEL BRODSKY, PH.D.

Tuesday, February 6, 2024  
Remotely Testifying from Reno, Nevada

Stenographically Reported By:  
Hanna Kim, CLR, CSR No. 13083  
Job No. 6437640

Page 1

CONFIDENTIAL

1 I was cited in the congressional record.

2 That's probably good enough for a start.

3 BY MR. ARLEDGE:

4 Q. You -- you have a Ph.D. in statistics from

5 Cal Berkeley?

10:11:49

6 A. That's correct, yes.

7 Q. What was your -- what was your emphasis or

8 your specialty in your Ph.D.?

9 A. Mathematical statistics.

10 Q. Okay. No -- no narrower specialization

10:12:01

11 than that?

12 A. No. But I later was a professor of

13 biostatistics at the University of Washington, and

14 my area was diabetes, endocrinology, and radiation

15 research.

10:12:17

16 Q. At -- at a high level, what does the fair

17 lending an- -- advanced analytics group at Wells

18 Fargo do?

19 A. It does all of the sta- -- it does mo- --

20 I'll say almost all of the statistical analyses and

10:12:29

21 modeling in regards to fair lending assessments for

22 all the reporting and all the analyses.

23 Q. You say "almost all."

24 Who else -- who else does that work at

25 Wells Fargo?

10:12:46

Page 15

CONFIDENTIAL

1           What I'm trying to say to you is is that  
2    if we see -- if we -- if we perfectly similarly  
3    situated and we saw this consistent whatever  
4    percent, then I would say we should look -- we would  
5    look into it carefully to try to understand where           11:12:42  
6    it's coming from, what the source of the difference  
7    is. And that's all I can -- I can't go any further  
8    than that.

9           Q.    Okay. Fine.

10           One of the possible explanations would --           11:12:55  
11    would be different treatments of White applicants  
12    and Black applicants.

13           You're just saying there may be another  
14    explanation, too, but we should go look for it;  
15    right?   11:13:05

16           A.    What I'm saying is we don't know what the  
17    explanation is. And I can say that since race is  
18    not available to the underwriter, that would be --  
19    that would be an area that I would question, if  
20    that's the source, until proven otherwise.                   11:13:17

21           Q.    You say "race is not available to the  
22    underwriter."

23                   What do you mean by that?

24           A.    They don't have that -- they don't have  
25    access to that data.   11:13:26

Page 68

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## CERTIFICATE OF REPORTER

I, Hanna Kim, a Certified Shorthand Reporter, do hereby certify:

That prior to being examined, the witness in the foregoing proceedings was by me duly sworn to testify to the truth, the whole truth, and nothing but the truth;

That said proceedings were taken before me at the time and place therein set forth remotely via videoconference and were taken down by me in shorthand and thereafter transcribed into typewriting under my direction and supervision;

I further certify that I am neither counsel for, nor related to, any party to said proceedings, not in anywise interested in the outcome thereof.

Further, that if the foregoing pertains to the original transcript of a deposition in a federal case, before completion of the proceedings, review of the transcript [X] was [ ] was not requested.

In witness whereof, I have hereunto subscribed my name.

Dated: 2/20/24



Hanna Kim

CLR, CSR No. 13083

Page 240